

May 19, 2006

Wendy Cohen
Chief of the Policy and Planning Unit
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California, 95670-6114

Dear Ms. Cohen,

The Shasta Tehama Watershed Education Coalition (STWEC) is a subwatershed member of the Sacramento Valley Water Quality Coalition (SVWQC). We are in full support of the Comments on Tentative Discharge Waiver letter sent to you by the SVWQC on May 18, 2006.

As a participating subwatershed group with over fourteen hundred members, we reviewed the Tentative Conditional Waiver and were impressed that it outlined a fair and balanced approach for irrigated land owners and operators to improve water quality from irrigated lands in the Central Valley. It is encouraging to see that we will be able to build on the volunteer efforts of irrigators throughout the Central Valley and continue our efforts to improve water quality.

I have attached a white paper recommending the deletion of paragraph 45. This recommendation resulted from deliberations by the STWEC Board of Directors and members. While it reflects the land use in Shasta and Tehama counties, it is probably representative of many other counties participating in the current Irrigated Lands Program. I hope the white paper helps in finalizing the next Conditional Waiver.

Thank you for the opportunity to comment. I can be reached at 530-472-1436 if you have any questions.

Robert Harris,
President,
Board of Directors,
Shasta Tehama Watershed Education Coalition

Shasta Tehama Watershed Education Coalition (STWEC) recommends deleting the non-commercial exemption clause from the Tentative Conditional Waiver

The STWEC has reviewed the Tentative Conditional Waiver. We have found that the document presents a fair and balanced approach for Central Valley irrigated landowners and operators to address agriculture related water quality. We are pleased to see that the CVRWQCB has incorporated input from participating coalitions as well as those of outside organizations.

We strongly recommend one change which we believe will make the coalition approach even more successful and lead to a more efficient and manageable irrigated lands program At the subwatershed level. We recommend that paragraph 45 on page 10 which excludes non-commercial irrigators be deleted. The following discussion presents some of the issues supporting our recommendation.

- 1) **Membership**- STWEC has 1400 members with about 900 members irrigating 12.5 acres or less. We predict that we would lose half of the 900 members, or about one-third of our membership, if paragraph 45 is not deleted. This would be a major membership setback after years of recruiting members. This new loop hole would also probably slow down future recruitment.
- 2) **Subwatershed Program Funding**- STWEC is a self funded organization, so we would suffer a loss of annual revenue if this clause remainins in the waiver program. This would require us to lower the water quality services we provide our members or force us to raise membership dues for the remaining two-thirds of our members to cover the shortfall. This increased cost comes when CVRWQCB is proposing tripling their fees (when the SWAMP overhead is included) to become over twenty percent of our annual budget.
- 3) **Monitoring**-Without non-commercial irrigators, land use patterns would result in monitoring drainages with a smaller portion of the irrigated acreage as member's acreage. This will lead to members feeling that they are paying for those who are getting a free ride and who are possibly contributors to water quality issues. STWEC has already experienced paying for the costs of monitoring and reporting for Burch Creek, only to find that the water quality issue is most probably non-agriculture related. Our members are tracking the CVRWQCB follow-up with the potential non-agriculture contributors including local government on the Burch Creek water quality issue .
- 4) **Management Plans**- If a water quality issue occurs, the management plan for outreach, BMPs, corrective action and follow-up monitoring will not include the non-commercial irrigators who could be the contributors to the issue. This will reduce the effectiveness of the plan and could lead to failure to fully correct the water quality issue.

- 5) **Land Use Changes**-As development spreads out into irrigated farm land in most of our drainages, farms are being sold and multiple smaller irrigated parcels are being created. The result, if these new parcels are out of the waiver program but still irrigating, is that less coalition members will be participating while more people will be irrigating.
- 6) **Neighbor to Neighbor Friction**-We currently have our members recruit new members with a goal of having one hundred percent of the irrigated land represented by the STWEC. If the non-commercial irrigators are dropped out, they will be irrigating just like their commercial neighbors. Their commercial neighbors will see that the non-commercial neighbors are irrigating while the commercial members are paying an increased cost if the non-commercial irrigation clause is not removed. This clause does not contribute to good public relations for a program that has an excellent start among all irrigators.
- 7) **Non-Commercial Irrigators**-With removal of the non-commercial irrigators, we will lose our ability to meaningfully track our level of membership. Our current metric, percentage of irrigated land participating in the waiver program, will no longer be valid as an unknown amount of irrigated acreage will be excluded if the non-commercial irrigators are removed from the program.

The STWEC appreciates having the opportunity to input our recommendation to the SVWQC and appreciates the support to date by the SVWQC for deleting paragraph 45, the non-commercial irrigator clause.